

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
CASE NO. 5:19-cv-00427-BO**

NOKIA TECHNOLOGIES OY,

Plaintiff,

v.

**LENOVO (SHANGHAI)
ELECTRONICS TECHNOLOGY CO.
LTD.; LENOVO GROUP, LTD.;
LENOVO BEIJING, LTD.; LENOVO PC
HK LIMITED; LENOVO (UNITED
STATES), INC.**

Defendants.

**CONSENT MOTION FOR
EXTENSION OF TIME TO RESPOND
TO MOTION TO LIFT STAY**

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, and with the consent of Plaintiff's counsel, Defendant Lenovo (United States), Inc. ("Lenovo US") moves the Court for an extension up to and including **April 7, 2021**, in which to respond to Plaintiff Nokia Technologies Oy's Motion to Lift Stay for the Limited Purpose of Requesting an Injunction Against a Second Filed Case Raising the Same Issues Present Here (ECF No. 119) ("Nokia's Motion to Lift Stay"). In support of this Motion, Lenovo US shows the Court the following:

1. On September 25, 2019, Plaintiff filed this Lawsuit;
2. On September 18, 2020, this Court entered an Order staying all proceedings (ECF No. 118);
3. On February 17, 2021, Nokia moved to lift the stay (ECF No. 119);
4. Under Local Civil Rule 7.3(f)(1), Lenovo US's response to Nokia's Motion to Lift Stay was originally due March 10, 2021;
5. On March 9, 2021, Lenovo filed a Consent Motion for Extension of Time to Respond

- to Motion to Lift Stay (ECF No. 122);
6. The Court granted the motion to extend time on March 10, 2021 (text order);
 7. Lenovo US needs additional time to evaluate Nokia's Motion to Lift Stay and to continue conversations with Nokia in an attempt to forego the need for Nokia's Motion altogether;
 8. Counsel for Lenovo US has contacted counsel for Plaintiff, who has consented to this Motion; and
 9. This Motion is made in good faith and not for the purpose of delay.

WHEREFORE, Lenovo US requests that this Court grant its motion and allow Lenovo US until April 7, 2021 to respond to Nokia's Motion to Lift Stay.

Respectfully submitted, this the 23rd day of March, 2021.

WOMBLE BOND DICKINSON (US) LLP

/s/ Jacob S. Wharton

Hayden J. Silver III, NCSB No. 10037
555 Fayetteville Street, Suite 1100
PO Box 831
Raleigh, North Carolina 27601
Telephone: (919) 755-2188
Facsimile: (919) 755-6099
E-mail: Jay.Silver@wbd-us.com

Jacob S. Wharton, NCSB No. 37421
One West 4th Street
Winston-Salem, North Carolina 27101
Telephone: (336) 747-6609
Facsimile: (336) 726-6985
E-mail: Jacob.Wharton@wbd-us.com

Attorneys for Defendant Lenovo (United States), Inc.